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Attorneys for California Department of Toxic
Substances Control, California Department of
Water Resources, et al.¹

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION
- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> | Affects PG&E Corporation |
| <input type="checkbox"/> | Affects Pacific Gas and Electric Company |
| <input checked="" type="checkbox"/> | Affects both Debtors |

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Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

REQUEST FOR SPECIAL NOTICE

¹ Pursuant to Rule 3-4 of the Local Rules for the United States District Court for the Northern District of California, made applicable to bankruptcy cases pursuant to Rule 1001-2(a) of the Bankruptcy Rules for the Northern District of California, in multiparty matters, reference may be made to the signature page for the complete list of parties.

1 PLEASE TAKE NOTICE that the California Department of Justice, Office of the
2 Attorney General and Felderstein Fitzgerald Willoughby & Pascuzzi LLP, co-counsel to
3 California Department of Toxic Substances Control, California Department of Water Resources,
4 State Water Resources Control Board, Regional Water Quality Control Boards, State Energy
5 Resources Conservation and Development Commission, California Department of Forestry and
6 Fire Protection, California Department of Fish and Wildlife, and California Air Resources Board,
7 interested parties herein (collectively the "California State Agencies") in the above-captioned
8 Chapter 11 jointly administered case ("Case"), hereby request that all notices given or required to
9 be given in this case to creditors, any creditors' committee, or any other party in interest
10 (including all matters described pursuant to Bankruptcy Code Section 102(1) and Bankruptcy
11 Rules 2002(a), (b), (c), (f) and (i), 3017(a), 9007 and 9010) and all papers or other documents
12 filed, served, or required to be served in the above-captioned Case, be served on the addressees
13 listed below and that, pursuant to Bankruptcy Rules 2002(g) and 9007, the following be added to
14 the Court's master mailing list:

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13 PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the
14 notices and papers referred to in the rules specified above but also includes, without limitation,
15 orders and notices of any plans, disclosure statements, applications, motions, petitions,
16 pleadings, requests, complaints, demands, whether formal or informal, whether written or oral
17 and whether transmitted or conveyed by mail delivery, telephone, telegraph, facsimile
18 transmission, telex, or otherwise.

19 PLEASE TAKE FURTHER NOTICE that neither this request for notice nor any
20 subsequent appearance, pleading, proof of claim, claim or suit is intended or shall be deemed or
21 construed as:

22 (a) a consent by the California State Agencies to the jurisdiction of this Court or any
23 other court with respect to proceedings, if any, commenced in any case against or otherwise
24 involving the California State Agencies;

25 (b) a waiver of any right of the California State Agencies to (i) have an Article III
26 judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a
27 Bankruptcy Judge may not enter a final order or judgement consistent with Article III of the
28 United States Constitution, (ii) have final orders in non-core matters entered only after *de novo*

1 review by a District Court Judge, (iii) trial by jury in any proceeding so triable in the Case or in
2 any case, controversy, or proceeding related to the Case, (iv) have the United States District
3 Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal,
4 (v) any and all rights, claims, actions, defenses, setoffs, recoupments or remedies to which the
5 California State Agencies are or may be entitled under agreements, in law or in equity, all of
6 which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved hereby,
7 (vi) the requirements for service of process under Federal Rule of Bankruptcy Procedure 7004;
8 or (vii) the requirements for service of an objection to claim under Federal Rule of Bankruptcy
9 Procedure 3007, all of which rights, claims, actions, defenses, setoffs, and recoupments the
10 California State Agencies expressly reserve; or

11 (c) a waiver of any objections or defenses that the State of California, the California
12 State Agencies or any other agency, unit or entity of the State of California may have to this
13 Court's jurisdiction over the State of California, the California State Agencies or such other
14 agency, unit or entity based upon the Eleventh Amendment to the United States Constitution or
15 related principles of sovereign immunity or otherwise, all of which objections and defenses are
16 hereby reserved.

17 Dated: February 26, 2019

Respectfully submitted,

18 XAVIER BECERRA
19 Attorney General of California
20 MARGARITA PADILLA
Supervising Deputy Attorney General

By: /s/ Paul J. Pascuzzi

21 STEVEN H. FELDERSTEIN
22 PAUL J. PASCUZZI
23 FELDERSTEIN FITZGERALD
24 WILLOUGHBY & PASCUZZI LLP
25 Attorneys for California
26 Department of Toxic Substances Control,
27 California Department of Water Resources,
28 State Water Resources Control Board,
Regional Water Quality Control Boards, and
State Energy Resources Conservation and
Development Commission, California
Department of Forestry and Fire Protection,
California Department of Fish and Wildlife,
and California Air Resources Board

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I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 400 Capitol Mall, Suite 1750, Sacramento, CA 95814. On February 26, 2019, I served the within documents:

By Electronic Service only via CM/ECF.

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